

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
RECEIVED LAFAYETTE

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WESTERN DISTRICT OF LOUISIANA
LAFAYETTE, LOUISIANA

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAFAYETTE DIVISION

UNITED STATES OF AMERICA	*	CRIMINAL NO. 6:19-CR-00183-01
	*	
VERSUS	*	JUDGE SUMMERHAYS
	*	
HOLDEN JAMES MATTHEWS	*	MAGISTRATE JUDGE WHITEHURST

ELEMENTS OF THE OFFENSES

COUNTS 1, 3, 5

**Intentional Damage to Religious Property
18 U.S.C. §§ 247(a)(1) and (d)(3)**

Title 18, United States Code, Section 247, makes it a crime for anyone to intentionally damage religious property because of the religious character of that property.

In order to be found guilty of this crime, the government must prove each of the following beyond a reasonable doubt:

- First:* That you defaced, damaged, or destroyed the religious real property described in the Indictment;
- Second:* That you did so intentionally;
- Third:* That you did so because of the property's religious character;
- Fourth:* That the crime was in or affected interstate or foreign commerce; and
- Fifth:* That you used fire in committing the crime.

“Interstate Commerce” means commerce or travel between one state, territory or possession of the United States, including the District of Columbia.

COUNT 2

Using Fire to Commit a Felony
18 U.S.C. § 844(h)(1)

Title 18, United States Code, Section 844, makes it a crime to use fire to commit a federal felony.

In order to be found guilty of this crime, the government must prove each of the following beyond a reasonable doubt:

First: That you used fire; and

Second: That you did so to commit the felony charged in Count 1, which may be prosecuted in federal court.

VENUE
18 U.S.C. § 3237(a)

If the case were to proceed to trial, the government would also have the burden of proving proper venue – that is the government would have to prove by a preponderance of the evidence that the offense was begun, continued, or completed in one of the Parishes that make up the Western District of Louisiana.

1-21-20
Date

Holden Matthews
HOLDEN MATTHEWS
Defendant

1-21-20

Date

D. Talbot

DUSTIN C. TALBOT
Assistant Federal Public Defender
102 Versailles Blvd, Suite 816
Lafayette, LA 70501
Telephone: (337) 262-6336
Counsel for Holden Matthews

DAVID C. JOSEPH
United States Attorney

2-10-20

Date

John Luke Walker

JOHN LUKE WALKER, LA Bar ID 18077
Assistant United States Attorney
800 Lafayette Street, Suite 2200
Lafayette, Louisiana 70501
Telephone: (337) 262-6618

2/10/20

Date

Risa Berkower

RISA BERKOWER, NY Bar ID 4536538
Trial Attorney
Criminal Section, Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Ave. NW
Washington D.C. 20530
Telephone (202) 305-0150